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2022-CC01111 - M & B OIL INC V FEDERATED MUTUAL INSURANCE ET AL (E-CASE)

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02/17/2021		Notice
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DEPARTMENT OF COMMERCE AN INSURANCE

Scheduled For: 03/22/2021; 9:00 AM; MICHAEL FRANCIS STELZER; City of St. Louis

Hearing Continued/Rescheduled

Hearing Continued From: 02/08/2021; 9:00 AM Jury Trial

01/13/2021 Alias Summons Issued

Document ID: 21-SMCC-423, for FEDERATED MUTUAL INSURANCE CO.

01/06/2021 Note to Clerk eFiling

Filed By: DAVID C. KNIERIEM

Alias Summons Requested

Request for alias summons.

Filed By: DAVID C. KNIERIEM On Behalf Of: M & B OIL, INC.

AMENDED NOTICE OF HEARING Filed By: DAVID C. KNIERIEM On Behalf Of: M & B OIL, INC.

12/24/2020 Notice of Hearing Filed

Notice of Hearing.

Filed By: DAVID C. KNIERIEM On Behalf Of: M & B OIL, INC.

Motion for Default Judgment

Motion for Default as to Federated Insurance; Affidavit.

Filed By: DAVID C. KNIERIEM On Behalf Of: M & B OIL, INC.

12/01/2020 Ury Trial Scheduled

Associated Entries: 02/01/2021 - Hearing Continued/Rescheduled

Scheduled For: 02/08/2021; 9:00 AM; MICHAEL FRANCIS STELZER; City of St. Louis

2/26/2021	Case: 4:21-cv-00250 Doc. #: 1case.netilexd2-02d/206/20cketages2 of 17 PageID #: 9
	Hearing Continued From: 12/14/2020; 9:00 AM Jury Trial
08/20/2020	Corporation Served Document ID - 20-SMCC-7142; Served To - FEDERATED MUTUAL INSURANCE CO; Server - ; Served Date - 12-AUG-20; Served Time - 09:35:00; Service Type - Sheriff Department; Reason Description - Served
08/19/2020	□ Corporation Served Document ID - 20-SMCC-7143; Served To - CITY OF ST LOUIS WATER DIV; Server - J GALLI, SERVICE DEPUTY; Served Date - 19-AUG-20; Served Time - 14:21:00; Service Type - Sheriff Department; Reason Description - Served; Service Text - CAROLY HARGACIA/EXEC SEC
08/06/2020	 Summons Issued-Circuit Document ID: 20-SMCC-7143, for CITY OF ST LOUIS WATER DIV. Summons Issued-Circuit Document ID: 20-SMCC-7142, for FEDERATED MUTUAL INSURANCE CO.
06/29/2020	☐ Jury Trial Scheduled Associated Entries: 12/01/2020 - Hearing Continued/Rescheduled Scheduled For: 12/14/2020; 9:00 AM; REX M BURLISON; City of St. Louis
06/10/2020	Summ Req-Circuit Pers Serv Memo to Clerk requesting summons. Filed By: DAVID C. KNIERIEM On Behalf Of: M & B OIL, INC.
06/09/2020	☐ Judge/Clerk - Note THE SUMMONS WAS NOT ISSUED, PLEASE E-FILE AN ADDITIONAL \$36.00 FOR THE CITY SHERIFF'S FEE OR A REQUEST FOR SPECIAL PROCESS SERVER, USING THE COURT APPROVED FORM. SEE stlcitycircuitcourt.com UNDER GENERAL INFORMATION-COURT FORMS.
06/05/2020	 Filing Info Sheet eFiling Filed By: DAVID C. KNIERIEM Pet Filed in Circuit Ct Petition; Exhibit 1 Policy.
	Filed By: DAVID C. KNIERIEM On Behalf Of: M & B OIL, INC. Judge Assigned

Case.net Version 5.14.12 Return to Top of Page Released 11/10/2020

Case: 4:21-cv-00250 Doc. #: 1-2 Filed: 02/26/21 Page: 3 of 172022#CC01111

IN THE CIRCUIT COURT OF THE CITY OF ST. LOUIS STATE OF MISSOURI

M & B OIL, INC.,)	
)	
Plaintiff,)	
)	
vs.)	Cause No.
)	
FEDERATED MUTUAL INSURANCE)	
COMPANY,)	Div. 1
Serve:)	
Director of Insurance)	
301 West High Street, Room 530)	JURY TRIAL DEMANDED
Jefferson City, MO 65101)	
•)	
and)	
)	
CITY OF ST. LOUIS)	
Serve: Officer in Charge, Water Division)	
1640 S. Kingshighway)	
St. Louis, MO 63110)	
Defendants)	

PETITION

Comes now Plaintiff, and for its cause of action against Defendants, states as follows:

- 1. Plaintiff is a domestic corporation.
- 2. The defendant Federated Mutual Insurance Company ("Federated") is a foreign insurance company.
- 3. The defendant City of St. Louis ("City") is a domestic municipal corporation that for purposes of this lawsuit was acting in a proprietary capacity of supplying water.
- 4. On or before February 2nd, 2019, Plaintiffs sustained damage due to a freezing water pipe on property owned by it at 2501 N. Grand Blvd, St. Louis, MO 63106.

Case: 4:21-cv-00250 Doc. #: 1-2 Filed: 02/26/21 Page: 4 of 17 PageID #: 11

Count I – Federated – Breach of Contract

- 5. Plaintiff restates and realleges paragraphs 1-4 of this Petition as if fully set forth herein.
- 6. Defendant Federated issued to plaintiff an insurance policy, # 6061069, attached as Exhibit 1, which provided coverage for this damage, and was in full force and effect at the time of the damage. This policy was issued in Missouri and delivered in Missouri.
 - 6. Plaintiff satisfied all conditions precedent under the policy.
- 7. Demand was made by Plaintiff to Defendant to provide coverage for this damage, and indemnify Plaintiff for its loss.
 - 8. Defendant has failed to pay the losses owed under the policy.
- 9. Plaintiff was damaged in an amount that has not been indemnified in excess of \$400,000.00.
- 10. In addition, this refusal to pay the value of the damage was vexatious and in bad faith as it was without reasonable cause or excuse, in that Defendant has unreasonably delayed payment of the loss, and has no basis for not paying the claim other than to unnecessarily delay payment, thereby entitling plaintiff to the penalties set forth in Mo. Rev. Stat. § 375.420, including attorneys' fees.

WHEREFORE, Plaintiff respectfully requests this court enter judgment against Defendant Federated in an amount in excess of \$25,000.00, pre- and post judgment interest, attorneys' fees, and a penalty of 20% of the first \$1500.00 of loss and 10% of the amount in excess of \$1500.00, costs, and any other relief this Court deems just and proper.

Case: 4:21-cv-00250 Doc. #: 1-2 Filed: 02/26/21 Page: 5 of 17 PageID #: 12

Count II – City – Detrimental Reliance

- 11. Plaintiff restates and realleges paragraphs 1-4 of this Petition as if fully set forth herein.
- 12. On February 2, 2019, Defendant City advised Plaintiff through the City of St. Louis Fire Department that it was shutting off the water to the premises.
- 13. The City failed to shut off the water, and did not advise either the Fire Department or Plaintiff of this.
- 14. Plaintiff relied on the City's statement that it was turning off the water to its detriment.
 - 15. As a result, Plaintiff sustained damages to its premises in excess of \$400,000.

WHEREFORE, plaintiff respectfully requests this court enter judgment against defendant in an amount in excess of \$25,000.00, pre- and post judgment interest, costs, and any other relief this Court deems just and proper.

LAW OFFICES OF DAVID C. KNIERIEM

/s/ David C. Knieriem
David C. Knieriem #37968
13321 North Outer Forty Road, Suite 100
Town & Country, MO 63017
314-862-5110
Attorney for Plaintiff

Case: 4:21-cv-00250 Doc. #: 1-2 Filed: 02/26/21 Page: 6 of 17 PageID #: 13

IN THE CIRCUIT COURT OF THE CITY OF ST. LOUIS STATE OF MISSOURI

M & B OIL, INC.,)	
Plaintiff,)	
vs.)	Cause No. 2022-CC01111
FEDERATED MUTUAL INSURANCE COMPANY, et al.)	Div. 1
Defendants.)	

MEMORANDUM TO CLERK

Please issue summons to:

FEDERATED MUTUAL INSURANCE COMPANY,

Serve:

Director of Insurance 301 West High Street, Room 530 Jefferson City, MO 65101

and

CITY OF ST. LOUIS

Serve: Officer in Charge, Water Division

1640 S. Kingshighway St. Louis, MO 63110

LAW OFFICES OF DAVID C. KNIERIEM

/s/ David C. Knieriem
David C. Knieriem #37968
13321 North Outer Forty Road, Suite 100
Town & Country, MO 63017
314-862-5110
Attorney for Plaintiff



Case: 4:21-cv-00250 Doc. #: 1-2 Filed: 02/26/21 Page: 7 of 17 PageID #: 14 IN THE 22ND JUDICIAL CIRCUIT, CITY OF ST LOUIS, MISSOURI

Judge or Division:		Case Number: 2022-CC01111		
REX M BURLISON				
Plaintiff/Petitioner:		Plaintiff's/Petitioner's Attorney/Ac	dress	
M & B OIL, INC.		DAVID C. KNIERIEM		
		13321 NORTH OUTER FORTY	RD	
		SUITE 100		
	VS	TOWN & COUNTRY, MO 63017		
Defendant/Respondent:		Court Address:	į	
FEDERATED MUTUAL II	NSURANCE CO	CIVIL COURTS BUILDING		
Nature of Suit:		10 N TUCKER BLVD	ŀ	
CC Breach of Contract		SAINT LOUIS, MO 63101	(Dat	te File Stamp)
	Sui	nmons in Civil Case		
The State of Missouri to	o: CITY OF ST LOUIS	WATER DIV		
	Alias:			
OFFICER IN CHARGE		1		
WATER DIVISION			SHERIFF'S FE	E PAIN
1640 S KINGSHIGHWAY			OHERWI OTE	
ST LOUIS, MO 63110 COURT SEAL OF	V		I to file very placeling to	- 4be petition s
COURT SEAL OF		to appear before this court and		
		tached, and to serve a copy of y		
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0	be taken against ye	ou for the relief demanded in the		
ance s	August 6, 20	20 ブ	P. Wheni	
CITY OF ST LOUIS	August 0, 20	20	Romas Kloeppinger	•
	Date		Clerk	
	Further Information:			
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Note to serving officer:		ned to the court within 30 days after th	ne date of issue.	
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		the petition to the defendant/responde	ant	
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incaving a copy of the	summons and a copy of the		dant's/respondent's family of	
15 years who perma	anently resides with the de		dan on copondon o raining o	Alon and ago of
		of the summons and a copy of the com	plaint to:	
	·	(name)	<u>'</u>	(title).
other:				
				
Served at			· ·	(address)
in	(County/Cit	y of St. Louis), MO, on	(date) at	(time).
··· <u></u>	(,	,	· ,	` ` '
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Printed Nam	ne of Sheriff or Server	· · · · · · · · · · · · · · · · · · ·	Signature of Sheriff or Server	
· · · · · · · · · · · · · · · · · · ·		tary public if not served by an authorize		
	Subscribed and sworn to	before me on	(date).	
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Non Est	.\$			•
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Supplemental Surcharge	\$10.00		•	
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Total	\$			
	•	st be served on each defendant/respo	ondent. For methods of serv	ice on all
classes of suits, see Supre				



Case: 4:21-cv-00250 Doc. #: 1-2 Filed: 02/26/21 Page: 8 of 17 PageID #: 15

IN THE 22ND JUDICIAL CIRCUIT, CITY OF ST LOUIS, MISSOURI

4				
Judge or Division:		Case Number: 2022-CC0111	1	
REX M BURLISON				
Plaintiff/Petitioner:		Plaintiff's/Petitioner's Attorney/	Address	
		DAVID C. KNIERIEM	/ ludi C55	
M & B OIL, INC.		13321 NORTH OUTER FORT	Y RD	
• •		SUITE 100		
	vs.	TOWN & COUNTRY, MO 630	17	
Defendant/Respondent:		Court Address:	···	
FEDERATED MUTUAL INSU	IRANCE CO	CIVIL COURTS BUILDING		
	701102 00	10 N TUCKER BLVD		
Nature of Suit:		SAINT LOUIS, MO 63101		(Dete File Stemp)
CC Breach of Contract				(Date File Stamp)
		nmons in Civil Case		·
The State of Missouri to:		IAL INSURANCE CO		
- ·	Alias:			
DIRECTOR OF INSURANCE	E20		COLE COUNTY, N	NO
301 WEST HIGH STREET, ROOM ! JEFFERSON CITY, MO 65101	550			
	You are summoned	I to appear before this court a	nd to file your pleadi	ing to the petition, a
		tached, and to serve a copy o		
	plaintiff/petitioner a	at the above address all withir	30 days after receiv	ing this summons,
		y of service. If you fail to file y		
		ou for the relief demanded in t		•
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CITY OF ST LOUIS	August 6, 20	20	Thomas Kloeppin	ger
	Date		Clerk	<i></i>
			OICIK	
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Note to parking officer: Sur		ned to the court within 30 days afte	r the date of issue	
_			i lile date of issue.	
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		the petition to the defendant/respondered the petition at the dwelling place or us		ant/respondent with
☐ leaving a copy of the sum	mons and a copy of the		endant's/respondent's fa	
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		(name)		(title).
☐ other:				·
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Served at			· · · · · · · · · · · · · · · · · · ·	(address)
in	(County/City	y of St. Louis), MO, on	(date) at _	(time).
	<u></u>		Oit	<u></u>
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		* *		
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Supplemental Surcharge \$_	10.00			
Mileage \$		miles @ \$ per mile)		
Total \$				
	copy of the petition mu	st be served on each defendant/res	spondent. For methods o	f service on all
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classes of suits, see Supreme Court Rule 54.

4:21-cv-00250 Doc**VERNON** dBE/7078 Page: 9 of 17 PageID #:316168 (Rev 7/17)

SHERIFF

CITY OF ST. LOUIS CIVIL COURTS BUILDING 10 NORTH TUCKER BOULEVARD ST. LOUIS, MISSOURI 63101 622-4851

DWOI M&BOIL Inc.

Return of Service on Summons/Petition and Subpoena

Address 1640 Kingshighury Case Number 2032 - CC 0/1/	?
Address 1640 Kingshighwy Case Number 2022 - CC 0/1/	
Executed: Summons / Petition Subpoens	
I hereby certify that I served the within summons and petition by: Subpoena How Served:	
Posting copy of Summons and copy of Petition, to dwelling listed on above address.	
Delivering a copy of the summons and a copy of the petition, to the Defendant/Respondent. How Served:	
Leaving a copy of the summons and a copy of the petition, at the dwelling place or usual abode of Defendant/Respondent with a family member over the age of 15 years	
Non-Est Reason:	
For service on a Corporation/Partnership: by delivering a copy of the Eviction/Replevin/Writ of Possession to An Agent and/or Appointed Agent Cardyn hargacin hargacin	(title). (name)
The Registered Agent:(name)	(title). (title).
Non-Est Reason:	
For service on Limited Liability Company (LLC): by delivering a copy of the summons and a copy the petition to:	opy of
The Registered Agent: (name)	(title).
An Authorized Person: (name)	(title).
An Organizer: (name)	(title).
Non-Est Reason:	
Served at 4000 MCRee (address	;)
in (City of St. Louis), MO, on $879-20$ (date) at $38/9$ (time).
Joe Galli Jac Calle # 675	
Print name of Sheriff or Server Signature of Sheriff or Server	

Case: 4:21-cv-00250 Doc. #: 1-2 Filed: 02/26/21 Page: 10 of 17 PageID #: 17 IN THE 22ND JUDICIAL CIRCUIT, CITY OF ST LOUIS, MISSOURI

Judge or Division: REX M BURLISON	Case Number: 2022-CC01111	Go Go
Plaintiff/Petitioner: M & B OIL, INC.	Plaintiff's/Petitioner's Attorney/Address DAVID C. KNIERIEM 13321 NORTH OUTER FORTY RD SUITE 100	Ç
Defendant/Respondent: FEDERATED MUTUAL INSURANCE CO	vs. TOWN & COUNTRY, MO 63017 Court Address: CIVIL COURTS BUILDING 10 N TUCKER BLVD	PATE I
Nature of Suit: CC Breach of Contract	SAINT LOUIS, MO 63101	(Date File Stamp)
	Summons in Civil Case	

The State of Missouri to: CITY OF ST LOUIS WATER DIV Alias:

OFFICER IN CHARGE WATER DIVISION 1640 S KINGSHIGHWAY ST LOUIS, MO 63110



You are summoned to appear before this court and to file your pleading to the petition, a copy of which is attached, and to serve a copy of your pleading upon the attorney for plaintiff/petitioner at the above address all within 30 days after receiving this summons, exclusive of the day of service. If you fail to file your pleading, judgment by default may be taken against you for the relief demanded in the petition.

August 6, 2020

Date

SHERIFF'S FEE PAID

	Further Information:	
	Sheriff's or Server's Return	
Note to serving officer:	Summons should be returned to the court within 30 days after	er the date of issue.
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in	(County/City of St. Louis), MO, on	(date) at(inno).
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Printed Nan	ne of Sheriff or Server Must be sworn before a notary public if not served by an auth	
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A copy of the summons a	nd a copy of the petition indative actived on each determine	

classes of suits, see Supreme Court Rule 54.

Case: 4:21-cv-00250 Doc. #: 1-2 Filed: 02/26/21 Page Dix Page Dix Page D #: 18

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EX M BURLISON	Plaintiff's Petitioner's Attorney/Address	AUG 1 0 2020
laintiff/Petitioner:	DAVID C. KNIERIEM	COLE COUNTY
1 & B OIL, INC.	13321 NORTH OUTER FORTY RD	COLE COUNTY SHERIFF'S OFFICE
	SUITE 100	GILLIAN SOLVE
e de la companya de	vs. TOWN & COUNTRY, MO 63017	
	Court Address:	
efendant/Respondent:	ON THE COURTS BUILDING	
EDERATED MUTUAL INSURANCE	10 N TUCKER BLVD	
ature of Suit:	SAINT LOUIS, MO 63101	(Date File Stamp)
C Breach of Contract	Civil Case	
	Summons in Civil Case	
The State of Missouri to: FEDERA	TED MUTUAL INSURANCE CO	
Alias:	COLF	COUNTY, MO
DIRECTOR OF INSURANCE	OOLL	333.11.1,
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delivering a copy of the summons	and a copy of the petition to the defendant/respondent. and a copy of the petition at the dwelling place or usual about a person of the defendant's/	le of the defendant/respondent with
		respondent's family over the age of
15 years who permanently reside	the defendant/respondent	
If or service on a corporation) deliv	refind a copy of the summons and in the	$\begin{array}{ccc} \text{(title)}. \end{array}$
Debra Lee	(name)Design	ICC
other:		
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Case: 4:21-cv-00250 Doc. #: 1-2 Filed: 02/26/21 Page: 12 of 17 PageID #: 19

IN THE CIRCUIT COURT OF THE CITY OF ST. LOUIS STATE OF MISSOURI

M & B OIL, INC.,)	
Plaintiff,)	
vs.)	Cause No. 2022-CC01111
FEDERATED MUTUAL INSURANCE)	
COMPANY, et al.)	Div. 1
Defendants.)	

MOTION FOR DEFAULT JUDGMENT AS TO FEDERATED MUTUAL

Comes now Plaintiff, and requests this Court enter default judgment as to Federated Mutual Insurance Company. As grounds for this Motion, Plaintiff states that more than 30 days have passed since Defendant was served, and Defendant has failed to respond. Plaintiff has attached an affidavit of damages.

LAW OFFICES OF DAVID C. KNIERIEM

/s/ David C. Knieriem
David C. Knieriem #37968
13321 North Outer Forty Road, Suite 100
Town & Country, MO 63017
314-862-5110
Attorney for Plaintiff

Certificate of Service

A copy of the foregoing was served this 24th day of December, 2020 via the courts electronic filing system to all attorneys of record.

Case: 4:21-cv-00250 Doc. #: 1-2 Filed: 02/26/21 Page: 13 of 17 PageID #: 20

IN THE CIRCUIT COURT OF THE CITY OF ST. LOUIS STATE OF MISSOURI

M & B OIL, INC.,)	
Plaintiff,)	
vs.)	Cause No. 2022-CC01111
FEDERATED MUTUAL INSURANCE COMPANY, et al.)	Div. 1
Defendants.)	DIV. I

NOTICE OF HEARING

Comes now Plaintiff, and states it will call up its motion for default judgment as to Federated Mutual Insurance Company on Monday, January 4, 2020 at 9am or as soon thereafter as counsel may be heard via the Court's video docket.

LAW OFFICES OF DAVID C. KNIERIEM

/s/ David C. Knieriem
David C. Knieriem #37968
13321 North Outer Forty Road, Suite 100
Town & Country, MO 63017
314-862-5110
Attorney for Plaintiff

Certificate of Service

A copy of the foregoing was served this 24th day of December, 2020 via the courts electronic filing system to all attorneys of record.

Case: 4:21-cv-00250 Doc. #: 1-2 Filed: 02/26/21 Page: 14 of 17 PageID #: 21

IN THE CIRCUIT COURT OF THE CITY OF ST. LOUIS STATE OF MISSOURI

M & B OIL, INC.,)	
Plaintiff,)	
vs.)	Cause No. 2022-CC01111
FEDERATED MUTUAL INSURANCE)	
COMPANY, et al.)	Div. 1
Defendants	Ś	

AMENDED NOTICE OF HEARING

Comes now Plaintiff, and states it will call up its motion for default judgment as to Federated Mutual Insurance Company on Monday, February 8, 2020 at 9am or as soon thereafter as counsel may be heard via the Court's video docket.

LAW OFFICES OF DAVID C. KNIERIEM

/s/ David C. Knieriem
David C. Knieriem #37968
13321 North Outer Forty Road, Suite 100
Town & Country, MO 63017
314-862-5110
Attorney for Plaintiff

Certificate of Service

A copy of the foregoing was served this 24th day of December, 2020 via the courts electronic filing system to all attorneys of record.

Case: 4:21-cv-00250 Doc. #: 1-2 Filed: 02/26/21 Page: 15 of 17 PageID #: 22

IN THE CIRCUIT COURT OF THE CITY OF ST. LOUIS STATE OF MISSOURI

M & B OIL, INC.,)	
Plaintiff,)	
vs.)	Cause No. 2022-CC01111
FEDERATED MUTUAL INSURANCE COMPANY, et al.)	Div. 1
Defendants.)	DIV. I

REQUEST FOR ALIAS SUMMONS

Comes now Plaintiff, and requests an alias summons be issued to:

Federated Mutual Insurance Company c/o Director of Insurance 301 West High Street, Room 530 Jefferson City, MO 65101

LAW OFFICES OF DAVID C. KNIERIEM

/s/ David C. Knieriem
David C. Knieriem #37968
13321 North Outer Forty Road, Suite 100
Town & Country, MO 63017
314-862-5110
Attorney for Plaintiff

Certificate of Service

A copy of the foregoing was served this 6th day of January, 2021 via the courts electronic filing system to all attorneys of record.



Case: 4:21-cv-00250 Doc. #: 1-2 Filed: 02/26/21 Page: 16 of 17 PageID #: 23 IN THE 22ND JUDICIAL CIRCUIT, CITY OF ST LOUIS, MISSOURI

Wind Co.				
Judge or Division:	Case Number: 2022-CC01111			
MICHAEL FRANCIS STELZER				
Plaintiff/Petitioner:	Plaintiff's/Petitioner's Attorney/Address			
M & B OIL, INC.	DAVID C. KNIERIEM			
,	13321 NORTH OUTER FORTY RD			
	SUITE 100			
VS.	TOWN & COUNTRY, MO 63017			
Defendant/Respondent:	Court Address:			
FEDERATED MUTUAL INSURANCE CO	CIVIL COURTS BUILDING			
Nature of Suit:	10 N TUCKER BLVD			
CC Breach of Contract	SAINT LOUIS, MO 63101	(Date File Stamp)		
ALIAS Summons in Civil Case				
The State of Microsuri to LEDEDATED MITHAL INCIDANCE CO				

Defendant/Respondent:	CLIDANICE CO	Court Address: CIVIL COURTS BUILDING					
FEDERATED MUTUAL IN	SURANCE CO	10 N TUCKER BLVD					
Nature of Suit: CC Breach of Contract		SAINT LOUIS, MO 63101		(Date File Stamp)			
50 Bicacii di Contract	ALIAC	Summons in Civil (Casa	(Date File Stamp)			
ALIAS Summons in Civil Case The State of Missouri to: FEDERATED MUTUAL INSURANCE CO							
The State of Missouri to	: FEDERATED MUTC Alias:	JAL INSURANCE CO					
DIRECTOR OF INSURANCE COLE COUNTY, MO							
301 WEST HIGH STREET, ROC	A 530		COLL COOK	COLE COUNTY, INC			
JEFFERSON CITY, MO 65101 COURT SEAL OF	You are summoned	d to appear before this cou	rt and to file your n	leading to the netition a			
COURTOR		tached, and to serve a cop					
		at the above address all wi					
(S(V)S)		y of service. If you fail to fi		dgment by default may			
	be taken against ye	ou for the relief demanded					
0/17/ 05 07 / 0///0	January 13, 20)21	Thomas Kloy	ngringer			
CITY OF ST LOUIS			Thomas Illoy Clerk				
	Date		Clerk				
	Further Information:	neriff's or Server's Return					
☐ leaving a copy of the s 15 years who permar ☐ (for service on a corpo ☐ other:	e summons and a copy of ummons and a copy of the nently resides with the def ration) delivering a copy of	the petition to the defendant/re the petition at the dwelling place of a person of the	or usual abode of the d defendant's/responder ne complaint to:	nt's family over the age of (title).			
		y of St. Louis), MO, on					
III	(County/Cit	y or St. Louis), MO, or	(uai	e) at (time).			
		otary public if not served by an au before me on		eriff or Server (date).			
	iviy commission expires.	Date	Nota	ry Public			
Sheriff's Fees, if applicabl	e						
Summons	\$						
Non Est	\$						
Sheriff's Deputy Salary	Ф 40.00						
Supplemental Surcharge	\$ <u>10.00</u>	miles @ \$ nor mil	lo)				
Mileage Total	\$(miles @ \$ per mil	ie)				
	T	ust be served on each defendan	it/respondent For meth	nods of service on all			
classes of suits, see Suprer		iot de serveu dir each uerenuan	ivrespondent. For meth	IOUS OF SELVICE OIT All			
, il							

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State of Missouri

Department of Commerce and Insurance



Corporate Secretary (or United States Manager or Last Appointed General Agent) of TO:

FEDERATED MUTUAL INSURANCE COMPANY

SR LEGAL COUNSEL 121 E. PARK SQUARE OWATONNA, MN 55060

Court: St. Louis City Circuit Court, Case Number: 2022-CC01111 RE:

You will take notice that original process in the suit against you, a copy of which is attached heretoand sent to you by certified mail, was duly served upon you at Jefferson City, Missouri, by serving the same on the Director of the Department of Commerce and Insurance of the state of Missouri, Dated at Jefferson City, Missouri this Friday, January 29, 2021.

Director of Commerce and Insurance

AFFIDAVIT

State of Missouri,

SS.

County of Cole,

The undersigned Director of the Department of Commerce and Insurance or the Director's designated agent, hereby makes oath and certifies the original of the apove notice to the above addressee was mailed at the United January 29, 2021 States Post Office in Jefferson City, Missouri on by first class certified mail prepaid as provided by section 375.906.5, RSMo. and Supreme Court Rule 54.15

Director, Department of Commerce and Insurance

Subscribed and sworn to before me this 29 day of

My commission expires:

Notary Public KATHRYN LATIMER My Commission Expires

Cale County Commissio #13 83 P5 E R E D

FEB 17 2021

PAC

301 West High Street, Room 530, P.O. Box 690 / JeffersonCity, Missouri 65102-0690 Telephone 573-526-0000 / TDD 1-573-526-4536 (Hearing Impaired) http://www.dci.mo.gov